

AUSAs: Jun Xiang / Kathryn Wheelock / Timothy Ly

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

v.

STEFANO PACHON-ROMERO,

Defendant.

**SEALED COMPLAINT**

Violations of 18 U.S.C. §§ 922(a)(1)(A)  
and 2

COUNTIES OF OFFENSE:  
BRONX, NEW YORK

SOUTHERN DISTRICT OF NEW YORK, ss.:

25 MJ1312

MICHAEL BONNER, being duly sworn, deposes and says that he is a Special Agent with Homeland Security Investigations ("HSI"), and charges as follows:

**COUNT ONE**  
**(Unlicensed Dealing of Firearms)**

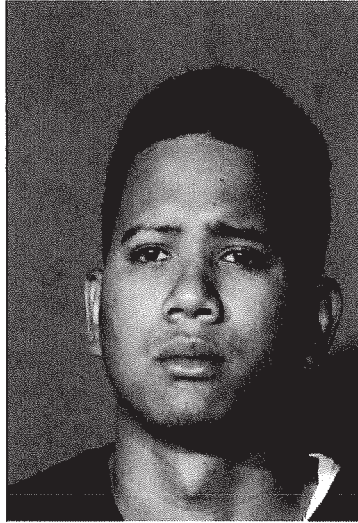
1. Between in or about September 2024 and in or about December 2024, in the Southern District of New York and elsewhere, STEFANO PACHON-ROMERO, the defendant, not being a licensed importer, licensed manufacturer, or licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, willfully and knowingly engaged in the business of importing, manufacturing, and dealing in firearms, and in the course of such business shipped, transported, and received a firearm in interstate and foreign commerce, and aided and abetted the same, to wit, PACHON-ROMERO engaged in the business of dealing firearms without a license in the New York City area.

(Title 18, United States Code, Sections 922(a)(1)(A) and 2.)

The bases for my knowledge and for the foregoing charge are, in part, as follows:

2. I am a Special Agent with HSI and I have been personally involved in the investigation of this matter. This affidavit is based upon my personal participation in the investigation, and my conversations with law enforcement officers, law enforcement employees, and witnesses, as well as my review of documents. Because this affidavit is being submitted for the limited purpose of establishing probable cause, it does not include all the facts that I have learned during the course of my investigation. Where the actions, statements, and conversations of others are reported herein, they are reported in substance and in part, except where otherwise indicated.

3. Since at least in or about October 2024, I have been conducting an investigation of suspected members and affiliates of the transnational gang Tren de Aragua ("TDA"), including STEFANO PACHON-ROMERO, the defendant. A photograph of PACHON-ROMERO appears below:



4. Based on my review of law enforcement records, my conversations with other law enforcement officers, who interviewed a confidential source who purchased firearms from STEFANO PACHON-ROMERO, the defendant, on multiple occasions and reviewed text message communications between PACHON-ROMERO and the confidential source, my review of immigration records, and my involvement in this investigation, I have learned, in substance and in part, the following:

- a. Based on my training and experience, my review of publicly available social media accounts, my interviews of current and former self-identified TDA members, and my personal surveillance of individuals identified by witnesses as, or otherwise believed to be TDA members, I know that TDA is a violent transnational gang, originating in Venezuela, that has established a substantial foothold in the United States, including in New York City. I have also become aware that there are substantial intra-gang conflicts within TDA and that, in some cases, TDA members have disavowed the gang and described themselves as “Anti-Tren.” I am aware that TDA members have engaged in numerous shootings and murders and that much of this violence is driven by hostilities between TDA and “Anti-Tren” members. Moreover, I am aware that a gang member’s self-identification as TDA or “Anti-Tren” can be fluid and that the same gang member may switch between the two affiliations depending on time and context.
- b. PACHON-ROMERO is a Venezuelan national without lawful immigration status in the United States and is a suspected member of TDA.
- c. On at least nine occasions between on or about September 28, 2024 and December 27, 2024, PACHON-ROMERO sold a total of ten firearms to a confidential source (the “CS”) working with law enforcement. Before each firearm transaction (the “Controlled Buys”), the CS arranged the purchase with PACHON-ROMERO via cellphone. Also before each Controlled Buy, law enforcement searched the CS for money and firearms, but none was found on him. The CS was then given cash by law enforcement to use to purchase the firearm(s) from PACHON-ROMERO.

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Then, after each Controlled Buy, the CS met law enforcement at a predetermined location and provided the firearm(s) that he purchased from PACHON-ROMERO to law enforcement.<sup>1</sup>

d. The details of the Controlled Buys are as follows:

- September 28, 2024: The CS purchased a Canik TP9SA 9mm semiautomatic handgun from PACHON-ROMERO for \$1,000 in a residential building in the Bronx (the “Building”). Law enforcement conducting surveillance of the buy observed PACHON-ROMERO meet the CS in front of the Building before they both went inside.
- October 3, 2024: The CS purchased a Smith & Wesson .38 revolver from PACHON-ROMERO for \$1,000 in the Building. Law enforcement conducting surveillance observed PACHON-ROMERO meet the CS in front of the Building before they both went inside.
- October 18, 2024: The CS purchased a Kral Arms XP shotgun from a man driving a white Jeep in the vicinity of 125th Street and Second Avenue in Manhattan in exchange for \$1,200. Before the transaction, the CS communicated with PACHON-ROMERO via text message, and PACHON-ROMERO said that he had the firearm for sale and that another person would handle delivery of the firearm.
- October 29, 2024: The CS purchased a Glock 22 .40 caliber firearm with an automatic switch attachment from PACHON-ROMERO for \$1,500 in the Building. Before the transaction, the CS communicated with PACHON-ROMERO via text message, and PACHON-ROMERO said that he had the firearm for sale.
- November 5, 2024: The CS purchased a Glock 17 9mm semiautomatic firearm with an extended magazine and an American Tactical .223 caliber semiautomatic assault rifle from PACHON-ROMERO for \$4,300, total, at the Building. Before the transaction, the CS communicated with PACHON-ROMERO via text message, and PACHON-ROMERO said that he had the firearms for sale. Law enforcement surveilling the transaction observed PACHON-ROMERO meet the CS at the door of the Building and then exit the Building with the CS after the transaction.
- November 12, 2024: The CS purchased a Smith & Wesson SD9VE 9mm semiautomatic firearm from PACHON-ROMERO for \$1,650 in the CS’s vehicle located at the northwest corner of 125th Street and Second Avenue in Manhattan. Before the transaction, the CS communicated with

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<sup>1</sup> The CS was paid by law enforcement in connection with his participation in each of the Controlled Buys, as well as when he provided other information to law enforcement regarding PACHON-ROMERO.

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PACHON-ROMERO via text message, and PACHON-ROMERO said that he had the firearm, among others, for sale. Law enforcement observed PACHON-ROMERO enter the CS's vehicle to conduct the transaction and exit afterwards.

- November 27, 2024: The CS purchased a Radical Firearms .223 caliber AR-pistol from PACHON-ROMERO for \$2,700 in the CS's vehicle located at the northwest corner of 125th Street and Second Avenue in Manhattan. Before the transaction, the CS conducted a recorded audio call with PACHON-ROMERO during which PACHON-ROMERO confirmed the details of the purchase. Law enforcement observed PACHON-ROMERO enter the CS's vehicle to conduct the transaction and exit afterwards.
- December 11, 2024: The CS purchased a Polymer 80 9mm semiautomatic firearm, which was a "ghost gun" without a serial number, from PACHON-ROMERO for \$1,600 in the Building. Before the transaction, the CS conducted a recorded FaceTime call with PACHON-ROMERO during which PACHON-ROMERO showed the CS the firearm that he would later purchase. The CS also exchanged text messages with PACHON-ROMERO discussing the transaction. Law enforcement observed PACHON-ROMERO meet the CS at the door of the building.
- December 27, 2024: The CS purchased a Taurus PT111 9mm semiautomatic firearm from PACHON-ROMERO for \$1,400 in the CS's vehicle located at the northwest corner of 125th Street and Second Avenue in Manhattan. Before the transaction, the CS conducted a recorded call with PACHON-ROMERO during which PACHON-ROMERO confirmed the details of the purchase. Law enforcement observed PACHON-ROMERO enter the CS's vehicle to conduct the transaction and exit afterwards.

- e. Before at least two Controlled Buys (November 27, 2024 and December 27, 2024), law enforcement recorded the serial numbers of the cash law enforcement gave to the CS to use in the Controlled Buys (the "Prerecorded Buy Money"). After each of those transactions, the CS informed law enforcement that PACHON-ROMERO posted photographs to his WhatsApp story depicting some of the Prerecorded Buy Money, and the CS provided law enforcement screenshots of the posts.

5. Based on my review of publicly available Facebook and WhatsApp posts, I am aware of the following:

- a. On or about November 1, 2024, a photograph was posted to a WhatsApp account with the display name "Stefano" showing an individual who I recognize to be STEFANO PACHON-ROMERO, the defendant, holding a firearm with an extended magazine.



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- b. On or about November 4, 2024, a photograph was posted to a Facebook account “Smith Escobar” showing an individual I recognize as PACHON-ROMERO holding a firearm with an extended magazine, based on my review of a known photograph of him in a law enforcement database. In addition, the gun in the Facebook photograph appears to be the same gun as in the WhatsApp photograph described in paragraph 5(a).

6. Based on my communications a Special Agent from the Bureau of Alcohol, Tobacco, Firearms, and Explosives who is familiar with the federal licenses required to deal, manufacture, and/or import firearms, I am aware that STEFANO PACHON-ROMERO does not currently have—and has never had—a federal license to deal, manufacture, or import firearms.

WHEREFORE, I respectfully request that STEFANO PACHON-ROMERO, the defendant, be arrested, and imprisoned or bailed, as the case may be.



MICHAEL BONNER  
Homeland Security Investigations

Sworn to me before me,  
this 11<sup>th</sup> day of April, 2025



THE HONORABLE GARY STEIN  
United States Magistrate Judge  
Southern District of New York